



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: DEC 18 2019

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Envirosolids, Dearborn, Michigan

FROM: Natalia Vazquez, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Envirosolids (a.k.a. ES Group)

Facility Location: 6011 Wyoming Avenue, Dearborn, Michigan 48126

Date of Inspection: December 5, 2019

EPA Inspector(s):

1. Natalia Vazquez, Environmental Engineer
2. Constantinos Loukeris, Environmental Engineer

Other Attendees

1. Steve Weis, Inspector, Michigan Department of Environment, Great Lakes and Energy
2. Chad Dickinson, Chief Operations Office, Envirosolids
3. Nathan Dickinson, Consultant, Envirosolids
4. Michael Drops, Environmental Compliance, Envirosolids

Contact Email Address: mdrops@envirosolids

Purpose of Inspection: to assess compliance with requirements of Michigan's minor source state permit (Permit to Install)

Facility Type: industrial water waste treatment

Regulations Central to Inspection: facility is subject to the requirements under its minor source state permit and State Implementation Plan.

Arrival Time: 1:40 p.m.

Departure Time: 3:25 p.m.

Inspection Type:

- ☒ Unannounced Inspection
- ☐ Announced Inspection

OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from EnviroSolids unless otherwise noted.

Process Description:

There are three main processes: industrial waste treatment, oil recovery, and stabilization of solids. The facility can accept waste water, slurry, or used oil in a variety of sized containers. EnviroSolids accepts non-hazardous industrial waste water which is treated with chemicals such as sulfuric acid, sodium hydroxide, and polymers to break oil emulsion. The facility removes total suspended solids in the industrial waste water and adds oxygen. The oil that is removed from the industrial waste water is tested and stored until it is sold. Solids are processed in the solid stabilization process. 80% of the treated solids are used for ground cover at landfills. The solid stabilization process is controlled by two scrubbers and the industrial waste treatment is controlled by one scrubber. The facility's current owners/operators (approximately 10 years) do not believe the scrubbers have been emissions tested.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

EPA used a FLIR GF-320 camera (FLIR camera) during the plant walkthrough. EPA inspectors observed hydrocarbon emissions from the scrubber's stack that controls the industrial waste treatment process. The second video taken is of the floating roof of a water storage tank (no. 2) that is located in the tank farm. Mr. Loukeris recommended that the facility inspect the floating roof of tank no. 2.

Photos and/or Videos: were taken during the inspection.

Two videos were taken with the FLIR camera.

Field Measurements: were not taken during this inspection.

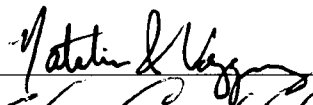
CLOSING CONFERENCE

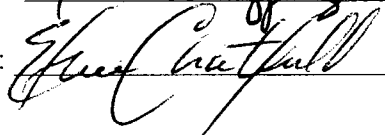
Requested documents:

- Copy of the facility map
- Scrubber monitoring data for waste water treatment and solid waste treatment processes for 2019
- 12 month rolling volatile organic compounds emissions for 2017 – 2019
- Annual emission for hazardous air pollutants and particulate matter for 2017 – 2019

Concerns: EPA inspectors identified as an area of concern, the observed emission from the waste water treatment scrubber.

SIGNATURES

Report Author:  Date: 12-18-19

Section Chief:  Date: 12-18-19

Facility Name: Enviro solids
Facility Location: Dearborn, Michigan
Date of Inspection: December 5, 2019

APPENDICES AND ATTACHMENTS

1. *Video log*
2. *Videos saved on a cd*

Facility Name: EnviroSolids
Location: Dearborn, Michigan
Date of Inspection: December 5, 2019

APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Constantinos Loukeris	2. Archival Record Location: CD-R labeled as <i>EnviroSolids, Dearborn, Mi, 12/5/2019</i>
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Image Number	File Name	Date and Time (incl. Time zone and DST)	Description of Image
1	MOV_2412.mp4	12/5/2019, 2:20pm EST	Hydrocarbon emission from waste water treatment scrubber
2	MOV_2413.mp4	12/5/2019, 2:50 pm EST	Water storage tank no. 2 and its floating roof